

Federal Communications Commission

RE: Comment to 05-157

Commissioners:

The Milwaukee Police Department provides wireless communication services for Police, Fire, Public Health and Public Works in the City of Milwaukee, Wisconsin. We are responsible for enhancement of wireless capability for all City agencies. The dearth of available spectrum to provide much needed wireless service hinders each agency's ability to deliver critical functions.

The City of Milwaukee utilizes UHF spectrum for Police applications and high VHF spectrum for Fire and Public Works communications needs. Radio frequencies in use were established in the 1960's and 1970's. What was adequate then is woefully overwhelmed now. Interoperability between Police and other agencies is difficult due to different frequency bands.

The Milwaukee Police Department is undertaking a radio system replacement for all City agencies. A digital trunked radio system is being implemented. This system utilizes TDMA technology to maximize spectrum use. Unfortunately, the only place that this system can be deployed is in 800 MHz spectrum. We have had to initialize this trunking system with 6 NPSPAC channels, as that was all that is available in this geographic area. We need at least 6 additional channels to provide the minimum capacity for a metropolitan radio system. At this point we are "borrowing" 6 channels from other NPSPAC allocations. This is a temporary solution. Our need for even more spectrum is thwarted by a lack thereof.

Our trunked radio system is capable of operation in 800 as well as 700 MHz spectrum. Unfortunately, 2 UHF television stations, recently implemented, exist in our coverage area. Based on proceedings to clear incumbents from the 746 MHz band, it will take years before such spectrum is available for our use.

We request the Commission expedite the clearing of the 746 MHz spectrum for Public Safety needs. This spectrum is sorely needed. We expect a component of interoperability solutions to be a common spectrum design. The 800 MHz spectrum is too congested to be a major player in metropolitan areas. Virgin spectrum that can be rationally appropriated with wide area interoperability in mind demands the 700 MHz allocations be cleared as soon as possible.

Wideband data applications are becoming an important tool for Public Safety users. The current offerings include commercial (such as Cingular, Nextel, or Verizon) and 802.11. Commercial service does not provide the reliability and security necessary for mission critical Public Safety use. The variants of 802.11 work, but demand heavy infrastructure investment, due to limited range of 2.4 and 5.8 GHz allocations. What Public Safety needs is high-speed wireless service, under our control, that provides the reliability and security we demand, but in a spectrum more conducive to wide area coverage. To that end we request the FCC release additional spectrum in the 700 MHz band for wideband operation. A common spectrum for voice, data, and wideband services offers the potential for a common radio platform.

Public safety still will need short range, small area wireless capability, and this may best be addressed through the 4.9 GHz allocations. This spectrum must remain in the purview of Public Safety so as to regulate its usage and minimize interference. While the allocation of 50 MHz in this band is appreciated, the 700 MHz band better addresses the core wireless needs of Public Safety. We ask that the 4.9 GHz band allocation be kept at no less than 50 MHz and the 700 MHz allocation be expanded for broadband wide area service.

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Finally, interoperability is creating needs for communications that traverse traditional political boundaries. Current rules constrict our ability to develop interoperability on a wide area. We therefore request the Commission modify rules with interoperability in mind. A specific request would be to ease/ remove the 3 mile limit on 40 dBu contours beyond political boundaries.

It is hoped that these comments will be given careful consideration so as to enhance Public Safety's ability to deliver the services so vital to the public at large. We look forward to additional spectrum in the very near future.

Thank you,

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